



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

June 20, 2005

B-19J

Hurston A. Nicholas  
Forest Supervisor  
USDA–Forest Service  
50 Highway 145 South  
Harrisburg, Illinois 62946  
Attn: Plan Revision Comments

**RE: Draft Environmental Impact Statement for the Proposed Land and Resource Management Plan for the Shawnee National Forest, Alexander, Gallatin, Hardin, Jackson, Johnson, Massac, Pope, Union and Williamson Counties, Illinois, EIS No. 20050107**

Dear Mr. Nicholas:

In accordance with Section 309 of the Clean Air Act and the National Environmental Policy Act (NEPA), the U.S. Environmental Protection Agency (U.S. EPA) has reviewed the Draft Environmental Impact Statement (DEIS) for the Proposed Land and Resource Management Plan for the Shawnee National Forest in Illinois. The Shawnee National Forest, established in 1939, is located at the southern tip of Illinois and is bordered on the east and south by the Ohio River and on the west by the Mississippi River. For over 70 years the Forest has been managed under the multiple-use concept, which ensures the conservation and wise use of its resources.

Through implementation of Forest Plans, the Forest Service intends to provide the public a variety of resource uses, recreational experiences and services while protecting physical and biological resources. The Shawnee National Forest contains some of the largest and most diverse blocks of mature hardwood forest, forest-interior habitat, bottomland forest and openland habitats in Illinois. At the same time, the Shawnee National Forest is appreciated for its recreational opportunities. The challenges the Forest Service is confronting while managing the Forest under the multiple-use concept are well documented in Shawnee's Proposed Land and Resource Management Plan, the associated DEIS, and the Need for Change Document. The seven areas identified as focus areas in this plan revision are:

- (1) Watershed Resources, (2) Biological Diversity and Wildlife and Aquatic Habitat,
- (3) Recreation Management, (4) Forest Ecosystem Health, (5) Mineral Resources,
- (6) Wilderness, Roadless Areas, and Wild and Scenic Rivers, and (7) Land Ownership.

The U.S. Forest Service evaluated four alternatives in the DEIS for revising the 1992 Plan. Alternative 1 is the No Action alternative, which represents continuing management as stipulated under the 1992 Plan. Alternative 2, the Preferred Alternative, emphasizes forest ecosystem health; Alternative 3 emphasizes preservation of old-growth forest and non-motorized recreation. Alternative 4 emphasizes recreational activities but is otherwise similar to Alternative 2. We believe that this range of alternatives is responsive to comments received from the public during the scoping phase.

Regarding watershed resources, EPA supports the protection of watersheds that provide drinking water to local communities, the restoration and management of bottomland hardwood forests, and the use of filter strips in sensitive riparian areas. EPA also supports the need to maintain oak-hickory forest-type within its natural range of variability, along with other diverse habitats on the Forest in order to promote recovery or sustain populations of threatened and endangered species, Regional-Forester designated sensitive species, and species of viability concern. We also support adaptive management and restrictive use approaches for managing natural resources that are adversely impacted by recreational activities. Because Alternative 2 emphasizes these principles, EPA concurs with the selection of Alternative 2 as the Preferred Alternative.

EPA has no objections to the Proposed Land and Resource Management Plan. We have rated the DEIS an 'LO'—Lack of Objections. We have enclosed an explanation of our rating. To further substantiate plans for the Shawnee National Forest, the Forest Service should consider providing the following information in the Final Environmental Impact Statement:

- Additional information regarding how management area prescriptions align geographically with pre-settlement, present, and projected forest communities.
- Coordination letters from resource agencies especially U.S. Fish & Wildlife Service, Illinois Department of Natural Resources, and the Illinois Historic Preservation Agency. This information would provide an interested reader with a sense of whether there were areas of debate between agencies or whether federal and state agencies concurred with the Forest Service's direction.

Thank you for the opportunity to review the Land and Resource Management Plan and DEIS. If you have any questions, please contact Sherry Kamke of my staff at (312) 353-5794.

Sincerely,

/s/

Kenneth A. Westlake, Chief  
NEPA Implementation Section  
Office of Science, Ecosystems, and Communities

cc: Randy Moore, Regional Forester

**SUMMARY OF RATING DEFINITIONS AND FOLLOW UP ACTION\***

## **Environmental Impact of the Action**

### LO-Lack of Objections

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

### EC-Environmental Concerns

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impacts. EPA would like to work with the lead agency to reduce these impacts.

### EO-Environmental Objections

The EPA review has identified significant environmental impacts that must be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

### EU-Environmentally Unsatisfactory

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the CEQ.

## **Adequacy of the Impact Statement**

### Category 1-Adequate

The EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collecting is necessary, but the reviewer may suggest the addition of clarifying language or information.

### Category 2-Insufficient Information

The draft EIS does not contain sufficient information for the EPA to fully assess the environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

### Category 3-Inadequate

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

\*From EPA Manual 1640 Policy and Procedures for the Review of the Federal Actions Impacting the Environment